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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA, : Case No. 1:18-CR-00513-CAB-1

Plaintiff,

: JUDGE CHRISTOPHER A. BOYKO

vs. :

.

AARON EISENBERG, : <u>UNOPPOSED MOTION TO</u>

CONTINUE TRIAL AND FINAL

Defendant. : PRETRIAL DATES

Now comes the Defendant, **AARON EISENBERG**, by and through his undersigned counsel, and respectfully moves this Honorable Court to enter an Order continuing the Monday, July 15, 2019 final pretrial and Monday, July 22, 2019 trial dates, for a period of not less than 60 days.

The basis for this request is that the parties continue to negotiate a resolution but that a final plea agreement has not yet been reached. Both the Defendant and the government are optimistic that a final plea resolution will be forthcoming, but additional time to finalize the actual plea agreement for the Defendant is needed. The Assistant United States Attorney assigned to this case, Aaron Howell, does not oppose the herein requested continuance.

WHEREFORE, for all of the aforestated reasons, the Defendant, AARON

EISENBERG, by and through his undersigned counsel, respectfully moves this

Honorable Court to enter an Order continuing the Monday, July 15, 2019 final pretrial

and Monday, July 22, 2019 trial dates, for a period of not less than 60 days, on the grounds that defense counsel and the government are in discussions for a plea resolution in this matter, but need additional time to finalize the actual plea agreement for the Defendant.

Respectfully submitted,

/8/- ANGELO F. LONARDO, ESQ.

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Counsel for **AARON EISENBERG**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 10th day of July, 2019, a copy of the following was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/- ANGELO F. LONARDO, ESQ. ANGELO F. LONARDO, ESQ.